

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

PHILIP A. MURPHY, JR. §
SANDRA R. NOE, and §
CLAIRE M. PALMER, §
Individually, and as Representatives of plan §
participants and plan beneficiaries of §
VERIZON's PENSION PLANS §
involuntarily re-classified and treated as §
transferred into IDEARC's PENSION PLANS §

Plaintiffs,
vs.

VERIZON COMMUNICATIONS, INC., §
VERIZON EMPLOYEE BENEFITS COMMITTEE, §
VERIZON PENSION PLAN FOR NEW YORK §
AND NEW ENGLAND ASSOCIATES, §
VERIZON MANAGEMENT PENSION PLAN, §
IDEARC EMPLOYEE BENEFITS COMMITTEE, §

Defendants.

CIVIL ACTION NO. 3:09-cv-2262-G

AFFIDAVIT OF C. WILLIAM JONES
IN SUPPORT OF MOTION FOR CLASS CERTIFICATION

I, C. William ("Bill") Jones, being duly sworn, depose and state of my own personal knowledge the following in support of Plaintiffs' Motion for Class Certification:

1. I am a United States citizen over the age of 21 years, and I reside at 7055 Thomas Lane, Easton, MD 21601-8333. I retired from NYNEX Corporation, now part of Verizon Communications Inc. ("Verizon"). I am a participant of the Verizon Management Pension Plan.

2. I am the President and Executive Director of a non-profit retiree organization formed in 1996 named "Association of BellTel Retirees, Inc. ("Association") See: <http://www.belltelretirees.org> One primary purpose of the Association is to protect and enhance

the benefits and related interests of the retirees.¹

3. The Association's current membership exceeds 110,000 retirees enrolled in Verizon's sponsored pension plans. The Association's membership also includes almost 1,400 former Verizon retirees who were involuntarily transferred during November 2006 into pension plans sponsored by Idearc Inc., now known as SuperMedia Inc.

4. Exhibit 5 submitted with Plaintiffs' motion for class certification is the Association's redacted list of known retirees involuntarily transferred into Idearc/SuperMedia's pension rolls. All persons listed are supportive of Plaintiffs' efforts in the *Murphy* case.

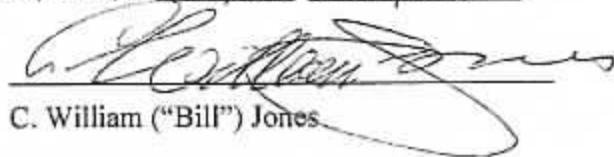
5. For almost a full decade, Attorney Curtis L. Kennedy of Denver, Colorado, has provided ERISA related legal services for the Association and various members. Some members of the Association directly asked me to engage Mr. Kennedy to investigate and challenge the legality of Verizon's involuntary transfer of retirees into Idearc's sponsored pension plans.

6. The Association maintains a dedicated webpage for posting of all important court filings and periodic updates with respect to the *Murphy* case: http://www.belltelretirees.org/index.php?option=com_content&view=article&id=44%3Alegal-developments&catid=5%3Aassociation-activities&Itemid=32 Plaintiffs regularly provide known potential class members with updated information about the litigation.

¹ The Association has the following Mission Statement: "The Association of BellTel Retirees Inc. is dedicated to promote the protection and enhancement of the pensions and benefits for all retirees and beneficiaries of the companies and subsidiaries that make up the Verizon and Idearc Corporations. The Association will convince the company to properly care for its thousands of dedicated former union and management employees. The Association will conduct activities designed to educate elected federal, state and local representatives and promote the passage of legislation which will protect and guarantee, rather than invade our hard-earned pension and benefits fund.

Further Affiant sayeth not. I declare the foregoing Affidavit consisting of three (3) pages, inclusive of notary provision, to be true and correct under penalty of perjury.

EXECUTED this 22th day of November, 2010, at Easton, Maryland.


C. William ("Bill") Jones

STATE OF Maryland)
) ss.
COUNTY OF Talbot)

The foregoing Affidavit of C. William ("Bill") Jones was acknowledged, subscribed, and sworn to before me this 22th day of November, 2010 by C. William ("Bill") Jones.

Witness my hand and official seal.

My commission expires on 1/14/12


Notary Public